

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE GOOGLE DIGITAL ADVERTISING  
ANTITRUST LITIGATION

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Case No. 1:21-md-3010 (PKC)

*This Document relates to:*

IN RE GOOGLE DIGITAL PUBLISHER  
LITIGATION

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Case No. 1:21-cv-7034 (PKC)

**NOTICE OF PUBLISHER CLASS PLAINTIFFS' MOTION FOR LEAVE TO AMEND  
THEIR CONSOLIDATED CLASS ACTION COMPLAINT**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law in Support of Publisher Class Plaintiffs' Motion for Leave to Amend Their Consolidated Class Action Complaint (the "Publisher Class Motion to Amend), dated October 5, 2022, and the Declaration of Philip Korologos in support of the Publisher Class Motion to Amend and the exhibits thereto, the Putative Publisher Class Plaintiffs<sup>1</sup> will move this Court, before the Honorable P. Kevin Castel, at the Courthouse of the United States District Court, Southern District of New York, located at 500 Pearl Street, New York, NY, for an order, pursuant to Federal Rule of Civil Procedure 15, permitting the Putative Publisher Class Plaintiffs to file a First Amended Consolidated Class Action Complaint.

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<sup>1</sup> Plaintiffs Genius Media Group (n/k/a MediaLab AI, Inc.), Sterling International Consulting Group, The Nation Company, L.P., The Progressive, Inc., JLaSalle Enterprises LLC, and Mikula Web Solutions, Inc. bring this action on behalf of themselves and those similarly situated and are collectively referred to herein as the "Putative Publisher Class Plaintiffs".

**PLEASE TAKE FURTHER NOTICE** that pursuant to Pretrial Order No. 2 (MDL 3010 ECF No. 309; hereinafter cited as “PTO No. 2”), any brief by Defendants in opposition shall be due by October 26, 2022.

**PLEASE TAKE FURTHER NOTICE** that pursuant to PTO No. 2, any reply brief by the Putative Publisher Class Plaintiffs shall be due by November 9, 2022.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is annexed hereto.

Dated: October 5, 2022  
New York, New York

Respectfully submitted,

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By: /s/ Philip Korologos

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Dated: October 5, 2022

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\*\* *Pro Hac Vice pending or to be filed  
imminently*